

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	X	
IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION	:	21 MC 102 (AKH)
	:	
	X	
BERTHA TACHE,	:	07-CV-1537 (AKH)
	:	
Plaintiff,	:	
	:	
-against-	:	
100 CHURCH, LLC, 160 WATER ST., INC., 160 WATER STREET ASSOCIATES, AJ GOLDSTEIN & CO., ALAN KASMAN DBA KASCO, ALAN L. MERRIL, AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY, BANKERS TRUST CORP., BANKERS TRUST NEW YORK CORPORATION, BATTERY PARK CITY AUTHORITY, BETTY JEAN GRANQUIST, BLACKMON-MOORING- STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BOARD OF EDUCATION OF THE CITY OF NEW YORK, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., CAROL GAYNOR TRUST, CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST, CAROL MERRIL GAYNOR, CUNNINGHAM DUCT CLEANING CO., INC., DEPARTMENT OF BUSINESS SERVICES, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC., FGP 90 WEST STREET INC., FRED GOLDSTEIN, G.L.O. MANAGEMENT, INC., GPS ENVIRONMENTAL CONSULTANTS, INC., HARLAND GAYNOR, AS TRUSTEE UNDER A DECLARATION OF TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A	:	

**FGP 90 WEST STREET,  
INC.'S NOTICE OF  
ADOPTION OF ANSWER TO  
MASTER COMPLAINT**

DECLARATION OF TRUST, HERMAN L. BLUM, AS :  
 TRUSTEE UNDER THE LAST WILL AND :  
 TESTAMENT OF LOUIS W. GOLDSTEIN, HILLMAN :  
 ENVIRONMENTAL GROUP, LLC., HUDSON VIEW :  
 EAST CONDOMINIUM, HUDSON VIEW TOWERS :  
 ASSOCIATES, IDELL GOLDSTEIN, AS TRUSTEE :  
 UNDER DECLARATION OF TRUST, INDOOR AIR :  
 PROFESSIONALS, INC., INDOOR :  
 ENVIRONMENTAL TECHNOLOGY, INC., JONES :  
 LANG LASALLE AMERICAS, INC., JONES LANG :  
 LASALLE SERVICES, INC., KASCO RESTORATION :  
 SERVICES CO., KIBEL COMPANIES, LAW :  
 ENGINEERING P.C., MARGARET G. WATERS, :  
 MARGUERITE K. LEWIS, AS TRUSTEE UNDER :  
 THE LAST WILL AND TESTAMENT OF LOUIS W. :  
 GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE :  
 OF THE GELBIN FAMILY, MERRILL LYNCH & :  
 CO,INC., NATALIE S. LEBOW, AS TRUSTEE OF :  
 THE JEREMIAH PHILIP LEBOW REVOCABLE :  
 TRUST, NATALIE S. LEBOW, AS TRUSTEE OF :  
 THE JERRY P. LEBOW FAMILY TRUST, NEW :  
 YORK CITY SCHOOL CONSTRUCTION :  
 AUTHORITY, NEW YORK UNIVERSITY, NOMURA :  
 HOLDING AMERICA, INC., NOMURASECURITIES :  
 INTERNATIONAL, INC., ONE WALL STREET :  
 HOLDINGS, LLC., PAMELA BETH KLEIN, AS . :  
 TRUSTEE OF THE PAMELA AND ROWAN KLEIN :  
 TRUST, R Y MANAGEMENT CO., INC., ROWAN K. :  
 KLEIN, AS TRUSTEE OF THE PAMELA AND :  
 ROWAN KLEIN TRUST, ROYAL AND :  
 SUNALLIANCE INSURANCE GROUP, PLC, RUTH :  
 G. LEBOW, RY MANAGEMENT, SABINE :  
 ZERARKA, SHIRLEY G. SHOCKLEY, AS TRUSTEE :  
 UNDER DECLARATION OF TRUST, STRUCTURE :  
 TONE (UK), INC., STRUCTURE TONE GLOBAL :  
 SERVICES, INC., SYLVIA R. GOLDSTEIN, THE :  
 BANK OF NEW YORK COMPANY, INC., :  
 TISHMANINTERIORS CORPORATION, TOSCORP :  
 INC., TRC ENGINEERS, INC., TRIBECA LANDING :  
 L.L.C., VERIZON NEW YORK, INC, WESTON :  
 SOLUTIONS, INC., WFP TOWER B CO. G.P. CORP., :  
 WFP TOWER B HOLDING CO., LP, WFP TOWER B. :  
 CO., L.P., AND ZAR REALTY MANAGEMENT :  
 CORP., ET AL, :  
 :  
 :

WFP TOWER D CO. G.P. CORP., WFP TOWER :  
DHOLDING CO. I L.P., WFP TOWER D HOLDING :  
CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., :  
and WFP TOWER D. CO., L.P., :  
: Defendants. :  
----- X

PLEASE TAKE NOTICE THAT Defendant FGP 90 West Street, Inc., by its attorneys, DLA Piper US LLP, as and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts FGP 90 West Street, Inc.'s Answer to Master Complaint dated August 3, 2007, which was filed in the matter *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). To the extent that FGP 90 West Street, Inc.'s Answer to the Master Complaint does not comprehensively address any of the allegations set forth in the Check-Off Complaint filed in the above-captioned matter, FGP 90 West Street, Inc. denies knowledge or information sufficient to form a belief as to the truth of such allegations.

WHEREFORE, FGP 90 West Street, Inc. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York.  
February 6, 2008

By: s/ Keara M. Gordon

Keara M. Gordon (KMG 2323)  
Michael D. Hynes (MH 5086)  
DLA PIPER US LLP  
1251 Avenue of the Americas  
New York, New York 10020-1104  
Phone: (212) 335-4500  
Facsimile: (212) 335-4501

Robert J. Mathias (\*pro hac vice  
application pending)  
The Marbury Building  
6225 Smith Avenue  
Baltimore, MD 21209-3600  
Phone: (410) 580-3000  
Fax: (410) 580-3001

*Attorneys for Defendant  
FGP 90 West Street, Inc.*